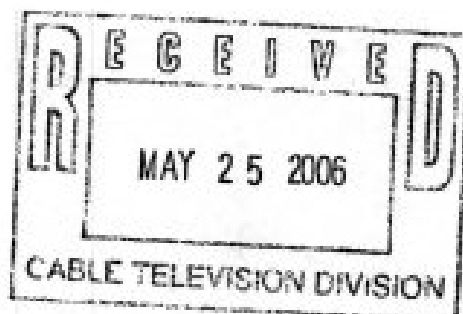


John L. Conroy
Vice President
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May 25, 2006

Alicia C. Matthews, Director
Cable Television Division
Department of Telecommunications & Energy
Commonwealth of Massachusetts
One South Station, 2nd Floor
Boston, Massachusetts 02110

Re: Proposed Amendments to Rule and Regulations Governing
the Cable Television Licensing Process; CTV 06-1

Dear Ms. Matthews:

The purpose of this letter is to address the schedule outlined by the Cable Television Division ("Division") in its Order Instituting Rulemaking and the Notice of Public Hearing and Request for Comment issued by the Cable Television Division in the above proceeding on May 5, 2006. In deciding to open the proceeding, the Division has taken the first step in expediting the many benefits of video competition to consumers in Massachusetts. Unfortunately, the schedule established by the Division would unnecessarily postpone those benefits to consumers. The purpose of the proposed regulation is to provide an accelerated process for the consideration and approval of competitive cable television license applications pursuant to G.L. c. 166A in order to encourage competition, speed the availability of real choice to consumers and bring new investment to the Commonwealth. As outlined in our Petition, encouraging competition has been a long standing policy of the Division and the Department of Telecommunications and Energy so that consumers may enjoy the pricing and service of a truly competitive marketplace. However, the interests of consumers are ill-served by the current schedule. Indeed, in a recent filing with the FCC¹ the United States

¹ Ex Parte Submission of the Department of Justice, *In the Matter of Implementation of Section 621(a)(1) of the Cable Communications Policy Act of 1984 as amended by the Cable Television Consumer Protection and Competition Act of 1992*, MB Docket No. 05-311, (May 10, 2006).

Department of Justice ("DOJ") noted its support of the FCC's efforts to ensure that the local franchising process does not unreasonably interfere with the introduction of additional competition in video distribution and broadband. The DOJ stated that regulatory restrictions and conditions on entry tend to shield incumbents from competition, and are associated with a range of economic inefficiencies including higher production costs, reduced innovation, and distorted service choices. Further, the DOJ stated that such restrictions should be avoided and that additional competition, particularly from wireline providers, has the potential to provide lower prices, better quality services, and more innovation to consumers.

Neither the proposed regulation nor the issues raised by the Division in its Order are complex or voluminous and do not require the many months the Division has allowed for comment, hearing and reply comment. As a result, Verizon believes that consumers would be best served by expediting the schedule so as to complete comments by early July. Such a time frame provides ample opportunity for public input and comments and allows the Division to meet its goal of advancing competition.

With these concerns in mind, Verizon asks that the Division revise the schedule for this rulemaking to provide for an orderly yet reasonably swift consideration of the proposed regulation and thus acknowledge the importance of acting quickly to expand consumer choice in cable television providers and to spread the benefits of competition to more consumers throughout the state.

Sincerely,

A handwritten signature in black ink, appearing to read "John H. Corning". The signature is fluid and cursive, with a large, looping "J" and "C".

cc: Chairman Judson
Commissioner Connelly
Commissioner Keating
Commissioner Afonso
Commissioner Golden
Andrew Kaplan